

9 Pam Schreiner depo (AZ) Powers 05-25-05
10 a binder, the ones that were from online. They had
11 already been printed and put in a binder. So I don't
12 know where they came from or, you know, they were just
13 on a shelf.

14 Q. Who had physical custody of these
15 binders?

16 A. I believe it was --

17 MS. REID-MOORE: Foundation. Go ahead.

18 THE WITNESS: I believe it was
19 Steve Tuttle's group.

20 Q. BY MR. DILLINGHAM: Okay. Is that where
21 you got these hard copy documents from when you first
22 gathered the documents to produce to Renaud Cook that
23 were on the green CD?

24 MS. REID-MOORE: Form, foundation.

25 THE WITNESS: Without -- I, honestly, I
don't know which -- the demo reports that Jami gave to

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1 me were what we had copied and scanned onto a CD.

2 Q. BY MR. DILLINGHAM: Okay.

3 A. So those are the ones that I actually
4 took to Alphagraphics, had them copied and scan them
5 onto a CD.

6 Q. Okay.

7 A. And those are the ones from Jami that I
8 had found throughout the building.

9 Q. All right. Now, when you produced the
10 documents to -- that human volunteer spreadsheet which
11 I had you hold up a few minutes ago --

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12 A. Yes.

13 Q. -- did you understand that you were
14 supposed to get all of the current information that
15 Taser had on their human volunteer spreadsheet to
16 produce?

17 MS. REID-MOORE: Form.

18 THE WITNESS: I was -- yes. I mean, I
19 knew to get to, you know, up to whatever date it was.

20 Q. BY MR. DILLINGHAM: which was May 4th of
21 2004, approximately?

22 A. Right. Yeah, around that time frame.

23 Q. Okay. Will you look at the last date on
24 that exhibit to see the last entry that's on there, and
25 tell me what the date is.

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1 A. May 23rd, 2000.

2 Q. When you got that, did you -- was it part
3 of your responsibility to look at it and see if it was
4 up to date, or did you just presume that what Jami had
5 sent you was up to date?

6 MS. REID-MOORE: Form.

7 THE WITNESS: I had -- I, being new, you
8 know, in the company, I was just naturally assuming
9 that things were -- which you should never assume
10 anything, but I assumed that it was up to date.

11 Q. BY MR. DILLINGHAM: Okay. So you
12 didn't --

13 A. I didn't even -- I honestly didn't even
14 look at it.

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15 Q. You just forwarded exactly what Jami had

16 e-mailed you from her computer?

17 A. Yes.

18 MS. REID-MOORE: Form.

19 Q. BY MR. DILLINGHAM: All right. At any
20 later date, did you ever have a discussion with Jami as
21 to why that data ends on May 23rd, 2000?

22 A. Yes.

23 Q. And what did she tell you?

24 A. There was a point where they decided,
25 meaning -- they meaning Taser, that they decided to

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1 change the form or the -- the form just a little bit,
2 or the worksheet, I'm sorry. They wanted to change it
3 just a little bit. And Rick had asked her to stop
4 inputting the information and change it.

5 Q. Okay. And did she tell you that was the
6 reason that the human volunteer data that she had
7 e-mailed to you ended on May 23rd, 2000?

8 MS. REID-MOORE: Form.

9 THE WITNESS: No, I don't recall that
10 discussion. I just -- I know that I had, you know,
11 wanted to find out why there was a change because it
12 was very noticeable that it had changed and --

13 Q. BY MR. DILLINGHAM: Did you ever see
14 another spreadsheet that had been generated by somebody
15 other than you containing information similar to what's
16 on that exhibit in front of you?

17 MS. REID-MOORE: Form.

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THE WITNESS: I actually seen this
19 spreadsheet, but at the -- the end of, you know, this
20 spreadsheet, where it ends here, it actually changed.
21 It was all on the same spreadsheet or worksheet, but at
22 the end it was just different. It had changed. You
23 could definitely tell that the formatting had changed.
24 Q. BY MR. DILLINGHAM: Okay. Was that
25 document ever gathered by you and produced by you in

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1 this case?
2 A. AS --
3 MS. REID-MOORE: Form.
4 Q. BY MR. DILLINGHAM: In this case, did
5 you ever at any time before you left get this other
6 document that you're just talking about and produce it
7 to Renaud Cook for distribution to us in this case?
8 A. Yes, I believe so.
9 Q. Okay. All right. Where did that
10 document come from?
11 MS. REID-MOORE: Form.
12 Q. BY MR. DILLINGHAM: I mean, you told us
13 about the screen that Jami Hill -- strike that. You
14 told us about the e-mail that Jami Hill had sent you
15 that gave rise to that document which was produced.
16 A. Yes.
17 Q. Did Jami Hill ever e-mail you another
18 document on your screen that you printed out?
19 A. Well, when I -- I went to her, and
20 when -- it was actually on the -- because we had a

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21 network, and on our, I believe it was the P drive,
22 there was -- this document was out on the P drive, and
23 she had shown me where it was on -- you know, in the
24 computer.
25 Q. Okay.

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1 A. She had e-mailed me this, you know,
2 something similar to this, and then told me where I
3 could locate it on the P drive. I believe it was the
4 P drive.

5 Q. Okay. And do you recall doing that at
6 some point?

7 A. At some point I did, yes.

8 Q. Okay. Do you recall when it was that you
9 did that?

10 A. No, sir, I don't.

11 Q. Did you ever make any entries into that
12 particular spreadsheet?

13 A. No, sir.

14 Q. What was the file name under which this
15 spreadsheet was maintained?

16 A. Oh, gee. I believe, and, again, don't
17 quote me on this --

18 Q. That's okay.

19 A. -- because I believe it was something
20 along the lines of human volunteer data or something in
21 relation to that.

22 Q. Okay.

23 A. I just -- I don't really recall.

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Q. Okay. I'm a little bit confused.
25 A. Okay.

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1 Q. When you first produced that document
2 which was included in the -- on the green disc --
3 A. Okay.
4 Q. -- was it your understanding at that time
5 that that was all that Taser had on that issue?
6 MS. REID-MOORE: Form, foundation.
7 THE WITNESS: Yes.
8 Q. BY MR. DILLINGHAM: Okay. At some later
9 date, did somebody tell you that there was another
10 spreadsheet floating around that you hadn't produced
11 the first time?
12 MS. REID-MOORE: Form.
13 THE WITNESS: It wasn't actually put to
14 me that way.
15 Q. BY MR. DILLINGHAM: How was it put to
16 you?
17 A. It was basically -- because I -- I was
18 going through, you know, other cases. And we were -- I
19 was trying to put together information so that it was
20 general, you know, so we always had a packet of
21 information, so that we knew, okay, you know, if this
22 lawsuit comes up, then we can send all of this
23 information, because they were generally the same, and
24 we would need to send the same general information.
25 I had actually looked at Jami's

1 spreadsheet and noticed at that time that there was
2 something different, that towards the end of it, the
3 scenario or the wording and the way it was had
4 changed. I had went to Jami and asked her why that was
5 or why does it look so different, and we -- that's how
6 we came on to that topic.

7 Q. Okay. I'm going to show you another
8 document and have you hold it up. And what it is is --
9 I don't have copies of this right now, but we've all
10 seen it a million times.

11 A. Okay.

12 Q. This is Taser's Response to Plaintiff's
13 Third Request for Production of Documents, and the date
14 of it is November the 19th, 2004.

15 A. Okay.

16 Q. All I would like you to do is hold up
17 that top sheet so that the camera can see it, first of
18 all.

19 Okay. Now, if you can hand it back to
20 me, I'm going to take you to another document in here.

21 A. Okay.

22 Q. And ask you to hold this up. And
23 it's --

24 MR. DILLINGHAM: Again, Brent, I would
25 like you to focus in on the Bates label.

2 Q. BY MR. DILLINGHAM: And just hold that up
3 for a second.

4 MS. REID-MOORE: Can I see?

5 Okay. Go ahead, sorry.

6 MR. DILLINGHAM: Tell me when you got
7 it, Brent.

8 THE VIDEOGRAPHER: Where is the label?

9 MR. DILLINGHAM: It's on the bottom
10 left.

11 THE VIDEOGRAPHER: Bottom left?

12 MR. DILLINGHAM: Yes.

13 THE VIDEOGRAPHER: Okay.

14 Q. BY MR. DILLINGHAM: Now, could you take a
15 look at that sheet that's Bates labeled 3RFP2-0001 on
16 the bottom.

17 A. Yes.

18 Q. Is this the spreadsheet that you created
19 from scratch?

20 A. No.

21 Q. Okay. Where did you get this spreadsheet
22 from?

23 A. This is actually the end of this.

24 Q. Okay. When did you first physically see
25 that in any form?

1 A. I, honestly, I don't remember date-wise
2 when it was, but I would say it was probably mid to end
3 of summer.

4 Q. Of 2004?

5 A. Yes, sir.

6 Q. You had never seen it before you produced
7 the documents that were contained on this green CD,
8 right?

9 A. I knew of this one, the one --

10 Q. The first one we talked about?

11 A. The first one.

12 Q. But --

13 A. And this one, I just -- I didn't really
14 notice it. I mean, I knew that, you know, this one
15 existed.

16 Q. Okay.

17 A. So -- and this is actually all of this.
18 I mean, it's all really the same.

19 MS. REID-MOORE: This is making a bad
20 mess on the record.

21 MR. DILLINGHAM: I know. I'm going to
22 clarify it.

23 Q. BY MR. DILLINGHAM: "This" and "this"
24 because --

25 A. I'm sorry. Oh, I'm sorry.

1 Q. Let me -- stay with me. Let's go slow.

2 A. Okay.

3 Q. All right. Hold up the one that you had
4 not seen before the documents were produced that were
5 on the green disc.

6 Okay. That's the one that on the Bates
7 label is 3RFP2-000001, right?

8 A. Yes.

9 Q. Okay. Now, how did you first become
10 aware that this second spreadsheet that you just held
11 up existed? How did you first become aware that it
12 even existed?

13 A. Because I was trying to pull together
14 information, like I said before, I was trying to gather
15 information for other lawsuits, and I was compiling a
16 generic packet, if you would, to say, okay, here's our
17 press releases, here's our medical safety reports,
18 here's, you know, here's the demo reports, things like
19 that. I was trying to compile, you know, get it all
20 together and have it so that we have CD's ready, we
21 have anything ready so that we just would have to send
22 it out.

23 Q. Okay. But how --

24 A. And when I -- I went into the P drive,
25 because I believe that's where it was at, I think it

1 was on the P drive, and I went into this particular
2 spreadsheet of Jami's, which was the human volunteer
3 spreadsheet, I had went into it, and I looked at it and
4 noticed that the formatting, you know, was different.
5 And I had went to her, and at that time said, are these
6 the same or did you change the formatting midstream,
7 you know, what is the deal because it doesn't -- it's
8 not jibing to me, because there's different things that
9 show on one, and now all of a sudden it's different on
10 another.

11 So I was just trying to figure out in my
12 own mind if it was the same or if they were different
13 or, you know, what the general process was.

14 Q. Okay. All right. The document that you
15 just held up, 3RFP2-00001 --

16 A. Uh-huh.

17 Q. -- okay, to your best recollection, that
18 was on the P drive, correct?

19 A. Yes.

20 Q. Did you ever make any entries on that
21 document that was on the P drive?

22 A. No.

23 Q. Okay.

24 A. Not at all.

25 Q. You said that at a later date, you did in

1 fact generate an entire new spreadsheet from scratch;
2 is that right?

3 A. Yes, that is correct.

4 Q. And you did that at Doug Klint's
5 direction, right?

6 A. Yes.

7 Q. Okay. Why did you do that?

8 A. We were actually trying to have more
9 formality, I guess, in, you know, keeping these files
10 straight. And because there were so many files
11 everywhere, the reports were just scattered throughout
12 the company that I -- you know, we needed to do
13 something to get some sort of a system in place and to

14 make it more uniform.

15 Q. So what you had to do, if I understand
16 your testimony correctly, you had to try to find the
17 individual demo reports from wherever you could find
18 them, and then you got them organized the way you
19 thought they should be organized, and then you started
20 from scratch an entire new spreadsheet in the form that
21 is before you that we were just talking about; is that
22 correct?

23 MS. REID-MOORE: Object to form,
24 foundation.

25 Q. BY MR. DILLINGHAM: Go ahead.

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1 A. Okay. Yes and no.

2 Q. Okay. Go ahead and explain.

3 A. It was a totally different format than
4 this.

5 Q. It was a totally different format than
6 the one that's Bates labeled --

7 A. 3RFP --

8 Q. -- 3RFP2-00001?

9 A. Yes, sir.

10 Q. Okay. What was different about the
11 format?

12 MS. REID-MOORE: I'm going to object if
13 you start getting into the content of it. That's the
14 spreadsheet that we've labeled as attorney work
15 product.

16 MR. DILLINGHAM: You've produced it.

17 MS. REID-MOORE: No, no, we have not. We
18 produced a supplemental disclosure saying that she was
19 directed to create a spreadsheet for this case.

20 And it's --

21 MR. DILLINGHAM: All I want to talk to
22 her about is the ones that have been produced in this
23 case.

24 MS. REID-MOORE: Okay.

25 MR. DILLINGHAM: Okay. And --

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1 MS. REID-MOORE: That's not -- that is
2 not what -- I don't believe that's what she's talking
3 about.

4 Q. BY MR. DILLINGHAM: Well, that's what I'm
5 trying to find out. The document that you generated
6 from scratch --

7 A. Uh-huh.

8 Q. -- did you at any time ever make a copy
9 of that, put it on a CD, and then produce it to Renaud
10 Cook in this case?

11 A. Yes, but it was -- it was for work
12 product. It was --

13 Q. Okay. All right. Your system, I
14 presume, is like most computer systems, when there's a
15 document on the system, in that sense that if somebody
16 accesses the document, you can identify the date that
17 the document is modified and the identification of the
18 person that does the modification?

19 MS. REID-MOORE: Form, foundation.

20 THE WITNESS: I'm assuming so, yes.

21 Q. BY MR. DILLINGHAM: Okay. Did you ever
22 talk to Jami directly to find out when she inputted the
23 data that is contained on the exhibit in front of you,
24 the one that's 3RFP2-00001?

25 A. There was a discussion sometime, you

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1 know, mid last year, toward -- you know, like in the
2 fall, early or late -- late summer, early fall, that --
3 because I had said to her, you know, if you're updating
4 this spreadsheet, you, please, let me know, notify me
5 somehow, either, you know, send me an e-mail, put a
6 note on my computer, something, just so I know that,
7 you know, you had added more information. Because it
8 was either her or her -- I don't know if it was her
9 assistant or the person that worked with her in her
10 department would actually add this information. And I
11 had asked them to please notify me if and when they
12 ever updated that spreadsheet.

13 Q. And what happened after that? What did
14 she -- did she ever get back to you and let you know?

15 A. She did. Occasionally they would let me
16 know that the spreadsheet was updated.

17 Q. And this was after you first produced the
18 documents that are on green disc that we talked about?

19 A. Yes, sir.

20 Q. Did she ever give you any explanation of
21 the extent to which it was updated after the date you
22 produced the document that was on the green disc?

23 A. I don't --

24 MS. REID-MOORE: Object to form. Go

25 ahead.

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1 THE WITNESS: I don't recall.

2 Q. BY MR. DILLINGHAM: Okay. The document
3 that was on the -- that's in front of you, 3RFP2-00001,
4 that was produced on November the 19th, 2004, because I
5 had you hold up that cover sheet that shows that was
6 the date that it was produced. Okay?

7 A. Yes sir.

8 Q. Now, if I understand your testimony
9 correctly, you think that you first had discovered the
10 existence of that document sometime in the summer of
11 2004?

12 A. Summer to -- yeah, it was, I would say,
13 you know, late summer, mid July, August something.

14 Q. Do you know why it took until November
15 before that was produced, provided to us in this case?

16 A. I --

17 MS. REID-MOORE: Form, foundation.

18 THE WITNESS: I truly don't recall, sir.
19 I'm sorry.

20 Q. BY MR. DILLINGHAM: Okay. Can I have
21 that document back for just a second.

22 A. This one?

23 Q. Yes, thanks.

24 When you first produced the documents
25 that were on this, the green CD, in May of 2004 --

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1 A. Yes.

2 Q. -- you attempted to produce all of the
3 individual demo report forms that you were able to
4 locate as of that time; is that correct?

5 A. Yes, sir.

6 Q. And your efforts to locate those
7 documents consisted of talking to Mr. Klint initially,
8 talking to Jami Hill, and then talking to Steve Tuttle?

9 A. Yes, that is correct.

10 Q. Okay. Now, sometime after you produced
11 the green disc --

12 A. Yes.

13 Q. -- or sometime after defendant produced
14 the green disc, you went back again and tried to find
15 more of these individual demo report forms; is that
16 right?

17 MS. REID-MOORE: Form.

18 THE WITNESS: That is correct.

19 Q. BY MR. DILLINGHAM: Okay. And who
20 directed you to do that, if anybody?

21 A. Nobody. I just did that on my own to try
22 and find any, you know, anything else that I may have
23 missed.

24 Q. Okay. And were you able to find
25 additional of these demo report forms?

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1 A. Yes. I believe we did find more.

2 Q. Where?

3 A. In a warehouse in the back, one of the
4 warehouses.

5 Q. Okay. Where was the warehouse located?

6 A. Well, we had different ones. We had the
7 accounting warehouse, we had the shipping and receiving
8 warehouse, and then we also had engineering. And I
9 believe we found some in the accounting warehouse and
10 we also found some in our shipping and receiving. And
11 then we have, in our production area, it was a loft
12 type area above production, and we found some
13 information up there as well.

14 Q. Okay. What I want to do is focus simply
15 on the demo reports. Okay?

16 A. Okay.

17 Q. Did you find some of the demo reports in
18 each of the locations that you just described?

19 A. Yes. I would say so.

20 Q. So there wasn't a centralized location
21 where these demo reports were maintained?

22 A. No, sir.

23 Q. Okay. Were the demo reports organized in
24 any way?

25 A. No, sir.

1 Q. Were they maintained in any sort of
2 logical filing system that you could see when you first

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discovered them?

4 MS. REID-MOORE: Form.

5 THE WITNESS: To me, no.

6 Q. BY MR. DILLINGHAM: Okay. Did you ever
7 ask anybody if anybody had ever looked at them before?

8 A. Yes. I had asked Jami, you know, what --
9 you know, if she did anything with these. And the ones
10 that we, you know, we were finding, she said were
11 possibly in the spreadsheet that we've been looking at.

12 Q. 00001?

13 A. Correct.

14 Q. Did she -- could she tell you for sure
15 whether they were --

16 A. No.

17 Q. -- in that spreadsheet?

18 A. No, sir.

19 Q. Okay. Did she tell you that once -- what
20 she did with the demo reports once she did enter the
21 information into the spreadsheet?

22 A. Yeah. There were several things that may
23 have happened or could have happened.

24 Q. What did she tell you?

25 A. There were things where they actually

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1 sometimes they'd file them. You know, some of them
2 possibly were thrown away, you know, things of that
3 nature.

4 Q. And that's what she told you?

5 A. Yes.

6 Q. Did she tell you there was any formal
7 procedure in place to make sure that certain people in
8 the company actually saw those demo reports?

9 A. No.

10 Q. Did you ever ask Mr. Tuttle whether he'd
11 ever actually seen any of those demo reports?

12 A. Well, I had actually asked Doug if -- you
13 know, I did ask Doug at one point, you know, if -- to
14 me, these things that, you know, may have been thrown
15 away or whatever, you know, is there a process for
16 shredding, you know, things of that nature. And he
17 said, you know, no, but that we were trying to get
18 something in place.

19 I had asked Steve if he had ever seen any
20 of the -- the form itself, if there was anything else
21 that he knew of. The only other things that they knew
22 of, but they weren't necessarily from training, it
23 could have been from, you know, an actual use of the
24 Taser, it was a use-of-force form that looked very
25 familiar or very similar to the demo report, and he

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1 showed me those.

2 Q. Okay. Did Jami ever tell you that there
3 was a procedure set up that before she would input the
4 information in the spreadsheet they would have been
5 routed through Mr. Tuttle so that he could have looked
6 at them?

7 A. No, sir.

8 MS. REID-MOORE: Form.

9 Q. BY MR. DILLINGHAM: Did she ever tell you
10 that after she entered the information into the
11 spreadsheet that the procedure was that she was to
12 forward them to Mr. Tuttle so he could look at them
13 before they were put some place?

14 A. No, sir.

15 Q. Okay. Has anybody at Taser ever told you
16 that they had such a procedure in place?

17 A. No, sir.

18 Q. Okay. Have you ever seen any documents
19 at Taser since you were there that in written form
20 established a protocol for the routing of these types
21 of documents?

22 MS. REID-MOORE: Form. Go ahead.

23 THE WITNESS: No, sir.

24 Q. BY MR. DILLINGHAM: Did you at any time
25 while you were at Taser ever shred any documents?

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1 A. No, sir.

2 Q. Did you, when you were at Taser, ever
3 produce any documents that -- well, strike that. Never
4 mind.

5 Did anybody ever explain to you -- strike
6 that.

7 Did anybody ever tell you that there was
8 certain information on certain demo reports that were
9 not being included in the spreadsheet?

10 MS. REID-MOORE: Form. Go ahead.

11 THE WITNESS: No, sir.

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Q. BY MR. DILLINGHAM: Okay. You never
13 personally studied the spreadsheet -- the demo reports
14 themselves to understand the information on them, did
15 you?
16 A. No.
17 Q. Okay. On the spreadsheet that we were
18 looking at, the 00001, there is a, at the very top,
19 there is a number 4,300 and -- what is that 26?
20 A. Yes.
21 Q. And then it says, "Don't touch." Do you
22 see that?
23 A. Yes.
24 Q. Do you know what that means?
25 MS. REID-MOORE: Foundation.

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1 THE WITNESS: I believe, and I'm only
2 speculating, I believe it's because there was a formula
3 in there. And they didn't want somebody to manually go
4 in and try and put a number on there creating the
5 formula to go away. That's all I can speculate. I
6 don't know why it's there.
7 Q. BY MR. DILLINGHAM: Did you ever ask
8 Jami Hill why it's there?
9 A. No.
10 Q. The software program that this database
11 is maintained on is what?
12 A. Excel.
13 Q. Okay. Is there a -- and you'd dealt with
14 Excel before you went to Taser, right?

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15 A. Yes.

16 Q. And you understand that when you deal
17 with Excel if you modify the document, you can actually
18 figure out, going into the properties portion of the
19 information in the computer, the date that someone last
20 modified a document?

21 A. Yes.

22 MS. REID-MOORE: Foundation.

23 Q. BY MR. DILLINGHAM: Okay. And you know
24 that that's also available at Taser where you can do
25 that if you wanted, right?

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1 MS. REID-MOORE: Foundation.

2 THE WITNESS: Yes.

3 Q. BY MR. DILLINGHAM: Did anybody at Taser
4 ever tell you that this document that you were just
5 looking at, 3RFP2-000001, identified all officers that
6 received hits that allegedly were injured during
7 training? Did they tell you that that was the purpose
8 for maintaining this document?

9 MS. REID-MOORE: Form.

10 THE WITNESS: It was told to me that
11 that would -- the spreadsheet was so that they could
12 gather information on the training as to, you know, if
13 someone was injured or something of that nature.

14 Q. BY MR. DILLINGHAM: Okay. When you put
15 together the spreadsheet that you were asked to put
16 together --

17 A. Yes.

18 Q. -- did you include in the spreadsheet
19 that you put together information in the file you had
20 on officers who had reported injuries by letter format?
21 MS. REID-MOORE: Object to form. I'm
22 going to instruct her not to answer.
23 MR. DILLINGHAM: No.
24 MS. REID-MOORE: You're getting into the
25 content of the spreadsheet itself.

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1 MR. DILLINGHAM: No. I'm entitled to
2 find out whether this spreadsheet includes all of the
3 officer reported injuries.
4 MS. REID-MOORE: This one.
5 MR. DILLINGHAM: Yeah, but I'm also
6 entitled to ask her to find out what the policy at
7 Taser was in keeping this documentation. I'm not going
8 to ask you for the document, Tina.
9 MS. REID-MOORE: Yeah, well, but that
10 documentation was made for purposes of this lawsuit,
11 not for fitting in with a policy that you want to try
12 to inquire about. We're talking about two different
13 things here.
14 MR. DILLINGHAM: Well, let me start --
15 MS. REID-MOORE: We truly are.
16 MR. DILLINGHAM: Let me start the other
17 way.
18 Q. BY MR. DILLINGHAM: You know, from
19 looking at this spreadsheet, that this doesn't include
20 the information that you had in your file of officers

21 Pam Schreiner depo (AZ) Powers 05-25-05
22 who reportedly sustained injuries?

23 MS. REID-MOORE: Form, foundation.

24 THE WITNESS: That is possibly correct,
25 yes.

Q. BY MR. DILLINGHAM: All right. As a

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1 matter of fact, when you talked to Jami about this
2 spreadsheet, you discussed with her the fact that those
3 types of reported injuries aren't contained in this
4 spreadsheet, right?

5 MS. REID-MOORE: Form.

6 THE WITNESS: I believe so, if I -- if I
7 understand the question correctly.

8 Q. BY MR. DILLINGHAM: Right. In other
9 words, if you got a letter from an officer or from an
10 attorney for an officer that says they were injured as
11 a result of a Taser exposure in a training incident, it
12 doesn't get incorporated into this spreadsheet,
13 3RFP2-000001?

14 A. That is correct.

15 Q. And you learned that from Jami Hill,
16 right?

17 A. Yes, sir.

18 Q. You also learned it from Steve Tuttle?

19 A. And at one point, Rick Guilbault actually
20 came on board with Taser, he is -- I don't know what
21 his title is now, but he was something in training,
22 so --

23 Q. Okay.

24 Pam Schreiner depo (AZ) Powers 05-25-05
A. But he was brand new, so I didn't really
25 go to him too much.

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1 Q. Okay. At any point in time when you were
2 there, did you ever gather the information that was in
3 either the single file that you had or the complaints
4 of -- the formal complaints of injuries --

5 A. Uh-huh.

6 Q. -- and provide that to HECOE, the
7 Human Effects Center of Excellence, as far as you know?

8 MS. REID-MOORE: Her personally?

9 MR. DILLINGHAM: Well, I'm going to get
10 there.

11 Q. BY MR. DILLINGHAM: Did anybody ever
12 tell you to gather information in that file on officer
13 reported injuries or the separate files where
14 complaints had been filed and tell you you needed to
15 gather that information so they could deliver it to the
16 Human Effects Center of Excellence for that
17 investigation?

18 MS. REID-MOORE: Form, foundation.

19 THE WITNESS: Not that I recall. I
20 mean, I don't -- I didn't even know that there was
21 anything, no.

22 Q. BY MR. DILLINGHAM: Okay. All right.
23 You at one point, from time to time, did gather copies
24 of these types of spreadsheets that we're looking at,
25 3RFP2-000001, and give them to somebody at Taser that

1 you understood was going to be sending them to HECOE,
2 though, right?

3 MS. REID-MOORE: Form.

4 THE WITNESS: I honestly don't know.

5 You know, there were times where people would ask me to
6 give them information, and I didn't know what they were
7 doing with it.

8 Q. BY MR. DILLINGHAM: I gotcha. Okay.

9 I'm going to take a five-minute break and
10 we'll be back, and I don't think you have too much
11 more.

12 THE WITNESS: Okay.

13 MR. DILLINGHAM: Thank you.

14 THE VIDEOGRAPHER: Off the record at
15 10:28.

16 (WHEREUPON, a break was taken.)

17 THE VIDEOGRAPHER: On the record at
18 10:34.

19 Q. BY MR. DILLINGHAM: Okay.

20 A. Okay.

21 Q. I'm going to have the court reporter hand
22 you an exhibit which is going to be marked as Exhibit 1
23 to your deposition, and I want you to take a look at
24 it.

25 A. Okay.

2 for identification.)

3 Q. BY MR. DILLINGHAM: And Exhibit 1 --
4 Exhibit 1 is a letter dated December 5th, 2003, which
5 is a demand letter that was forwarded in this case.

6 And can you tell me, Pam, whether or not
7 you recall putting this document in the Powers file?

8 MS. REID-MOORE: Object to form.

9 THE WITNESS: I can honestly tell you I
10 know I did not put this in there.

11 Q. BY MR. DILLINGHAM: Okay. Have you ever
12 seen that document before?

13 A. No, sir.

14 Q. Okay. When you went back and started
15 putting -- creating your own spreadsheet, you had to
16 gather the various demo report forms that you were able
17 to find to begin that process; is that right?

18 A. Yes, sir.

19 Q. Okay. When you found those additional
20 demo report forms that you've talked about a few
21 minutes ago, did you then generate that second CD that
22 I had you hold up and send it to Renaud Cook for
23 distribution to us?

24 MS. REID-MOORE: Object to form.

25 THE WITNESS: Yes.

1 Q. BY MR. DILLINGHAM: All right. Why did
2 you start from scratch as opposed to simply add to or
3 supplement the document that you had received from
4 Jami Hill on the -- that you found out about on the

5 P drive?

6 MS. REID-MOORE: Object to form,
7 foundation. I'm going to have to ask her -- instruct
8 her not to answer.

9 MR. DILLINGHAM: You know, Christina, I'm
10 going to call Chris because --

11 MS. REID-MOORE: No, that's fine. I
12 mean --

13 MR. DILLINGHAM: Well, let me finish.
14 Let me just give you --

15 MS. REID-MOORE: I mean --

16 MR. DILLINGHAM: Doug Klint specifically
17 waived the privilege. He discussed with her what he
18 asked her to do and told her exactly what to do. It's
19 in his deposition. He specifically --

20 MS. REID-MOORE: There are no specifics
21 on that attorney work product document, I can tell you
22 that, in his deposition. There are no specifics on
23 what's contained in there --

24 MR. DILLINGHAM: No, I didn't ask her
25 what was contained.

1 MS. REID-MOORE: -- and what she was
2 asked to put in there and how to create it.

3 MR. DILLINGHAM: No. He testified what
4 he told her to do with creating that document. I'll
5 give you the page and line.

6 MS. REID-MOORE: Well, you'll have to --
7 go ahead and call Chris. I'm not going to open this

8 up.

9 MR. DILLINGHAM: Okay. You may have to
10 be here a little longer than we thought.

11 THE VIDEOGRAPHER: Do you want to go
12 off, John?

13 MR. DILLINGHAM: No. We can stay on.

14 Tom, why don't you find that in his --
15 and we'll continue. I don't want to make her stay here
16 unnecessarily, but --

17 (WHEREUPON, a discussion was held off the
18 record.)

19 Q. BY MR. DILLINGHAM: When you left
20 Taser --

21 A. Yes.

22 Q. -- did you take your file cabinet with
23 you?

24 A. No.

25 Q. Why did you leave it?

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1 A. I was not allowed to go back and get
2 anything.

3 Q. So they kept your own personal file
4 cabinet?

5 A. Yes.

6 Q. Did you ever ask them to return it?

7 A. No.

8 Q. So the files that you maintained on these
9 complaints that you talked about and the single file
10 where other reports of injury came in were in the exact

11 same location when you left as during the time when you
12 were maintaining them?

13 MS. REID-MOORE: Form.

14 THE WITNESS: Yes, sir.

15 MR. DILLINGHAM: Christina, just for the
16 record, on Page 99 of Doug Klint's deposition, I asked
17 him this question referring to Pam. I said, "What you
18 did was you told her to take those forms that you found
19 and then bring the database current?"

20 That is a -- and his answer was
21 "Correct." There wasn't even an objection on
22 attorney-client privilege, and that's all I'm asking
23 her about, is whether the database was -- why she
24 didn't maintain the -- bring it current as -- why she
25 just didn't bring it current as opposed to start over.

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1 He said he told her to bring it current.
2 She said she started over. All I'm trying to find out
3 is why she didn't just bring it current as opposed to
4 start over. That's exactly the question I asked him.

5 MS. REID-MOORE: Is that all you're going
6 to ask her?

7 MR. DILLINGHAM: That's all I'm going to
8 ask.

9 MS. REID-MOORE: Okay.

10 Q. BY MR. DILLINGHAM: All right. why did
11 you start over with the database as opposed to simply
12 bring the database that you got on the P drive from
13 Jami Hill current?

14 A. I -- truly when we found additional forms
15 or, you know, the demo reports, honestly Jami and I,
16 neither one of us knew if it had already been added to
17 the spreadsheet. So it was a matter of not knowing if
18 it had already been added.

19 Q. I gotcha. So when you went back and
20 talked to Jami, she wasn't able to tell you whether all
21 of the human demo report individual forms that you
22 found had ever been included on the database that she
23 sent you on the P drive that we talked about,
24 RFP-00001, and so in order to make sure you got
25 everything, you just started from scratch, right?

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1 MS. REID-MOORE: Form.

2 THE WITNESS: That is correct.

3 Q. BY MR. DILLINGHAM: All right. So as
4 far as you knew, they didn't even have a process for
5 making -- for checking off or identifying the
6 individual demo reports once those were entered into
7 the system?

8 MS. REID-MOORE: Form and foundation.

9 THE WITNESS: That is correct.

10 Q. BY MR. DILLINGHAM: I assume you created
11 such a protocol when you created yours?

12 MS. REID-MOORE: Form.

13 THE WITNESS: That is true.

14 Q. BY MR. DILLINGHAM: All right. Did
15 anybody ever give you any indication how many of these
16 demo reports had been thrown out that you talked about

17 earlier?

18 MS. REID-MOORE: Form.

19 THE WITNESS: No, sir.

20 Q. BY MR. DILLINGHAM: Did anybody ever tell
21 you why they were thrown out?

22 A. I was just told that they didn't need
23 them.

24 Q. Okay.

25 A. That the information had been entered

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1 into this, so --

2 Q. Okay.

3 MS. REID-MOORE: I'm sorry, "this"
4 being?

5 THE WITNESS: I'm sorry, into -- I'm
6 sorry, into the spreadsheet RF -- I don't have the
7 number here.

8 MS. REID-MOORE: The 3RPF2-000001?

9 THE WITNESS: Yes.

10 MS. REID-MOORE: The five zeros.

11 THE WITNESS: I'm sorry, I don't have
12 the number.

13 Q. BY MR. DILLINGHAM: So the 3RFP2-00001,
14 you don't even know if all the demo reports that you
15 later sent to us are reflected in that 3RFP2-00001
16 spreadsheet, right?

17 MS. REID-MOORE: Foundation.

18 THE WITNESS: That is correct.

19 Q. BY MR. DILLINGHAM: And you don't even
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20 know if some of the demo reports that are identified
21 and summarized in that spreadsheet even exist?

22 MS. REID-MOORE: Form, foundation.

23 Q. BY MR. DILLINGHAM: Correct?

24 A. That is correct.

25 Q. At any point in time before you left,

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1 were you ever asked to gather any information that
2 Taser had concerning officers' reports of injury other
3 than what we've talked about in terms of the demo
4 reports or the human volunteer data spreadsheets?

5 A. Not to my knowledge. I don't believe
6 so.

7 Q. Okay. These -- this file that you
8 maintained, the single file, where you had reports of
9 injury that were not formal complaints, was that
10 maintained in the same file drawer as the other files
11 on the individual files that were maintained when
12 complaints were filed?

13 A. Yes, sir.

14 Q. So if somebody that understood how you
15 maintained your files went to your file cabinet and
16 opened up that drawer, they would be able to get not
17 only the individual files of the complaints, but also
18 that file that had the various letters and documents on
19 injuries that hadn't resulted in a formal complaint
20 being filed?

21 MS. REID-MOORE: Form, foundation.

22 THE WITNESS: That is correct.

23 Q. BY MR. DILLINGHAM: While you were at
24 Taser, did you ever hear anybody from Taser claim that
25 no officer has ever sustained a significant injury

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1 during training?

2 MS. REID-MOORE: Form.

3 THE WITNESS: I, honestly, I don't know.
4 I mean, there was always discussions about different
5 topics. So to single out something said, I can't
6 honestly answer that.

7 Q. BY MR. DILLINGHAM: Okay. Did you ever
8 hear them discuss the Powers case, anybody?

9 A. Not really. I mean, Doug would -- you
10 know, I would talk to Doug about things if I needed to
11 get together information or something.

12 Q. Okay. Were you ever asked to do anything
13 by anybody at Taser that you felt wasn't honest or on
14 the up-and-up?

15 MS. REID-MOORE: Object to form.

16 THE WITNESS: Not really. I mean, I had
17 my own opinions of things.

18 Q. BY MR. DILLINGHAM: What do you mean you
19 had your own opinions of things?

20 A. Well, I just -- I -- I felt that there
21 were things that should have been done differently.

22 Q. Like what?

23 A. You know, from working in a law firm, I
24 just felt that there needed to be more -- a larger
25 sense of urgency or confidentiality or things of that

1 nature.

2 Q. Okay. And did you express that to
3 anybody while you were there?

4 A. Yes, on many occasions.

5 Q. who? who did you express it to?

6 A. Doug Klint, Rick, the upper -- the upper
7 powers.

8 Q. And what type of response did you get?

9 A. There was really never any actual
10 response. I -- you know, they would listen -- well,
11 Doug would listen more than Rick, but Doug would listen
12 and I would just -- you know, we would talk about it
13 later or, you know, something along that line.

14 Q. Do you feel like your comments were
15 falling on deaf ears?

16 MS. REID-MOORE: Form.

17 THE WITNESS: I would say yes.

18 Q. BY MR. DILLINGHAM: And while you were
19 there, did they ever change their protocol of keeping
20 track of information as it was coming in?

21 MS. REID-MOORE: Form.

22 THE WITNESS: As far as -- are we talking
23 of the 00001 or just in general?

24 Q. BY MR. DILLINGHAM: Just in general.

25 MS. REID-MOORE: And what was -- I'm

1 sorry, what was the question?

2 Q. BY MR. DILLINGHAM: Did their policy or
3 procedures change at all with respect to how they dealt
4 with incoming communications or documents?

5 MS. REID-MOORE: Form, foundation.

6 THE WITNESS: There were some things that
7 were changing. As, you know, as far as if someone
8 called in, you know, who they might want to talk to,
9 you know, things of that nature. Towards the end of
10 the year, they brought somebody in to handle
11 documentation in the production area as far as how
12 training would be handled, you know, how the work bees
13 would be trained or things of that nature.

14 They also, towards the end of the year
15 last year, all of a sudden, they were concerned
16 about dumpster diving and brought in these big huge
17 containers that were locked so that people could put
18 documents in it to be shred at some point.

19 Q. BY MR. DILLINGHAM: And that began
20 towards the end of 2004?

21 A. Yes, sir.

22 Q. Okay. But in terms of maintaining a
23 procedure for date stamping incoming mail, routing it
24 to certain people, did that ever change?

25 A. No, sir.

1 MS. REID-MOORE: Foundation.

2 Q. BY MR. DILLINGHAM: Did you have the

3 Pam Schreiner depo (AZ) Powers 05-25-05
responsibility for maintaining Rick Smith's calendar?

4 A. Yes, sir.

5 Q. So, for example, if he was scheduled to
6 give a deposition in a particular case, it would be
7 your responsibility to calendar it and make sure he was
8 aware about it?

9 A. Yes, sir.

10 Q. Are you aware of any other cases that
11 Mr. Smith has been deposed in, other than this case,
12 relating to an injury sustained by an officer in
13 training?

14 A. I do recall him being deposed. Whether
15 or not it was an injury, honestly I don't know that. I
16 just know that it was a case that I think may have
17 started before I started. I don't recall.

18 Q. Do you remember the name of the case?

19 A. I believe the last name, and, again, I'm
20 just speculating, I think it was Torres, T-O-R-R-E-S, I
21 believe.

22 Q. Okay.

23 A. It was in California.

24 Q. Okay. Did anybody at Taser ever discuss
25 with you how many stock options they had and how much

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1 money they'd made since they've been associated with
2 this business?

3 A. They never actually discussed how much
4 money they made, but they would, you know, share with
5 me things that they were doing in their, you know,

6 Pam Schreiner depo (AZ) Powers 05-25-05
7 personal life that was in, you know, regards to what
8 they did stock-wise.

9 Q. And who were some of the people that
10 shared that with you?

11 A. Well, Jami Hill, and then there were
12 several that would be very open about it within the
13 company, that you could hear them talking about their
14 new cars or house or, you know, whatever.

15 Q. What did Jami Hill talk with you about?

16 A. That she, you know, that because she's so
17 young, because I believe she's early 20's, that, you
18 know, since she had been working at Taser that she did
19 very well for herself and that she -- because she was
20 building, or she had bought a condo and that she was
21 remodeling it and because of the money that she had
22 made with Taser.

23 Q. Okay. Did she talk about the stock
24 options that she had at all?

25 A. No. We really never got into that.

Q. Okay.

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1 A. But, you know, everybody -- you know, I
2 mean, everybody would talk about it. You know, all the
3 people that were there that had been there for a while
4 had always, you know, they'd pull up in their brand new
5 Hummers or, you know, whatever.

6 And that -- but that was good. I mean, I
7 praised them. I thought, you know, that was great.
8 You know, if you can -- if the company is doing that

9 Pam Schreiner depo (AZ) Powers 05-25-05
10 well, then I think that's a great thing.

11 Q. Okay. Have you ever spent any time to
12 really take a look at what this weapon does, how it
13 works, anything like that?

14 MS. REID-MOORE: Form.

15 THE WITNESS: No, sir.

16 Q. BY MR. DILLINGHAM: Have you ever spent
17 any time analyzing how frequently officers report
18 injuries during training or anything like that?

19 A. No, sir.

20 Q. At any point in time while you were
21 there, were you ever asked to gather any information on
22 any animal testing that Taser had conducted?

23 A. I don't recall. I mean, I may have been,
24 you know, asked to pull together any kind of studies
25 which would have -- that would have fallen into that
realm, but I don't recall just specifically on an

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1 animal, no.

2 Q. Did you ever at any time while you were
3 at Taser go to Max Nerheim and ask Mr. Nerheim whether
4 he had any contemporaneous field testing data regarding
5 any animal studies conducted by Taser?

6 A. I don't recall. I went to Max and asked
7 him if, you know, I had an e-mail or something from
8 somebody, because I honestly don't know the terminology
9 or the lingo. And I had showed it to him and asked him
10 if he knew of this study or something along that line.

11 Q. And how did he respond?

12 Pam Schreiner depo (AZ) Powers 05-25-05
13 A. He actually -- he didn't -- he really
14 didn't respond to me. He just was -- had said that he
15 would get me a copy of whatever it was that I was
16 looking for.

17 Q. From time to time, did Mr. Klint
18 actually hand you a copy of our request for production
19 of documents and tell you to gather those specific
20 documents that were requested?

21 A. Yes, at times he would do that.

22 MR. DILLINGHAM: Okay. I'm going to
23 have to take a break. We're going to have to go off
24 the record for a second.

25 THE VIDEOGRAPHER: Off the record at
10:51.

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1 (WHEREUPON, a break was taken.)
2 (Deposition Exhibit No. 2 marked
3 for identification.)

4 THE VIDEOGRAPHER: On the record at
5 10:56.

6 Q. BY MR. DILLINGHAM: Okay. Pam, I've just
7 handed you what's been marked for your deposition as
8 Exhibit Number 2, which is Plaintiff's Third Request
9 for Production of Documents in this case.

10 A. Yes, sir.

11 Q. Just take a couple of minutes and just
12 skim through it. And I'm going to just ask you whether
13 or not this document looks familiar to you.

14 A. Yes, sir.

Pam Schreiner depo (AZ) Powers 05-25-05

15 Q. Okay. Was this one of the documents that
16 you had been given at some point by Doug Klint and
17 asked to go gather the documents that had been
18 requested on?

19 A. Yes, sir.

20 Q. Okay. Would you take a look at
21 Exhibit -- at Paragraph 6 on Page 4. And I'm going to
22 read it out loud and just tell me if I'm reading it
23 accurately.

24 "Copies of all documents evidencing the
25 testing, including test protocol, test parameters, and

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1 test results, relating to the anesthetized pig test,
2 dog tests, and pig tests designed by Mr. (sic) McDaniel
3 and Dr. Leslie Geddes, as testified to by Rick Smith in
4 his September 29th, 2004 deposition."

5 A. Yes, sir.

6 Q. Did I read that accurate?

7 A. Yes, sir.

8 Q. Okay. Did you in fact try to gather
9 those documents?

10 A. Yes, I did.

11 Q. And who did you go to to get those
12 documents?

13 A. I went to Steve Tuttle and Mark Johnson.

14 Q. Okay. And did you produce to
15 Renaud Cook all the documents you got from them?

16 A. Yes, anything that I was able to locate.

17 Q. Did they ever tell you that you needed to

18 Pam Schreiner depo (AZ) Powers 05-25-05
19 go to Rick Smith or to Max Nerheim in order to get
20 other documents that may fall within the scope of that
21 request?

22 A. Someone, and I, honestly, I don't recall
23 what it was about, but someone had mentioned to me to
24 go to Max for something, but, again, I don't recall
25 what it was actually pertaining to.

And, also, I was -- someone had asked

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1 me to go to Rick regarding, I think it was the
2 Leslie Geddes, I believe that's how you pronounce it,
3 for something that he may have had.

4 Q. Okay.

5 A. And that would be it, but --

6 Q. And did you in fact gather all the
7 documents that they had given you and then produce them
8 to Renaud Cook for production in this case?

9 A. Anything that I was able to obtain, yes.

10 Q. Okay. You didn't withhold anything or
11 nobody told you inside Taser not to produce anything?

12 A. Not to my recollection.

13 Q. But you don't -- you certainly don't know
14 whether they gave you everything they had that fell
15 within that category, do you?

16 MS. REID-MOORE: Form, foundation. Go
17 ahead.

18 THE WITNESS: That I can honestly say I
19 don't know. I mean, I asked for it. And, you know,
20 whatever I was given or was able to obtain is what I

21 Pam Schreiner depo (AZ) Powers 05-25-05
21 gave.
22 (WHEREUPON, a discussion was held off the
23 record.)
24 Q. BY MR. DILLINGHAM: Okay. Does the name
25 Burt Robinson sound familiar? Was that the Chandler

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1 officer that talked to you before your termination?
2 A. I don't know what his last name was.
3 Q. Okay.
4 A. I just know his name was Burt.
5 Q. Were they making any notes during any
6 period of time that you were talking to them?
7 A. Yes.
8 Q. Did they ever tell you you had the right
9 to have counsel present during any of that?
10 A. No.
11 Q. Were you physically escorted off the
12 property?
13 A. I was -- as for these investigations,
14 yes. I was -- I was asked to leave with someone.
15 Q. I just want to make sure I've covered
16 everything that you understood was their bone of
17 contention with you. And the one thing was opening up
18 the letter from the Securities and Exchange Commission.
19 A. Yes.
20 Q. And the other had to do with sending a
21 wrong order form in or something.
22 A. There was something -- they kept asking
23 me questions about some purchase order that came from

24 Pam Schreiner depo (AZ) Powers 05-25-05
somebody at the end of the year that was received by
25 fax or something. I honestly don't know because I

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1 didn't do anything with purchase orders, so --

2 Q. Was there anything about your
3 relationship with anybody at Taser that you believed in
4 any way contributed to this dismissal?

5 MS. REID-MOORE: Form.

6 THE WITNESS: I don't understand. I --

7 Q. BY MR. DILLINGHAM: In other words, was
8 there anything going on, that, you know, you weren't
9 getting along with anybody at Taser for some reason or
10 another that precipitated this?

11 A. I thought I was getting along with
12 everybody very well. I -- you know.

13 MR. DILLINGHAM: Okay. That's all I
14 have.

15 MS. REID-MOORE: I just have a few
16 questions and I truly do have a few.

17 EXAMINATION

18 BY MS. REID-MOORE:

19 Q. Early when you talked about the filing of
20 complaints for suits that were filed, do you know if
21 those complaints were ones that were actually served on
22 Taser?

23 A. I can only -- I can only speculate that I
24 thought that they were served. I never accepted
25 service on them.

1 Q. The file cabinet that you say you kept in
2 your area -- because I don't believe you had an office
3 there.

4 A. Right.

5 Q. The file cabinet that you said that you
6 kept in your area you said that there was information
7 in there relating to Rick Smith and Phil Smith,
8 correct?

9 A. Yes.

10 Q. Did Rick Smith and Phil Smith also have
11 access to that file cabinet while you were there if
12 they wanted to have access to it?

13 A. Yes.

14 Q. You were also asked earlier whether or
15 not Jami Hill ever told you that after she entered the
16 human volunteer demo reports whether she gave them to
17 Steve Tuttle to look at.

18 Let me ask you this. Do you have any
19 knowledge either way whether Steve Tuttle reviewed
20 human volunteer demo reports before you worked at
21 Taser?

22 A. No, no.

23 Q. When you first provided Renaud Cook
24 Drury with information in this case relating to
25 requests for production, was that information provided

1 to us, the first production of it, in a hard copy? Do
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2 you recall?

3 A. Yes.

4 MS. REID-MOORE: Those are all the
5 questions I have.

6 MR. DILLINGHAM: Couple of questions and
7 then I'm done.

8 FURTHER EXAMINATION

9 BY MR. DILLINGHAM:

10 Q. Any of the demo reports that you ever
11 reviewed that you ever entered into the spreadsheet
12 that you entered in -- I'm talking about the demo
13 reports themselves.

14 A. Okay.

15 Q. Did you bother to take notice of whether
16 or not any of those demo reports identified injuries or
17 the nature of the injuries or anything like that?

18 A. I'm not following you. Did you -- do you
19 mean --

20 Q. Did you pay attention to whether or not
21 the information on the demo report itself identified
22 a report of an injury, or did you just input the data
23 without really paying attention to that detail?

24 A. I just input the information off of the
25 form. I really didn't pay too much attention to, you

1 know, what the specifics were. I just went -- you
2 know, if it said "yes," I put "yes" on the spreadsheet.

3 Q. Okay. And there were some that did and
4 some that didn't?

5 A. Yes.

6 Q. Can you give me any idea, in terms of
7 percentage of total forms that you reviewed, that had
8 "yes" for injuries as opposed to "no?"

9 A. Ah.

10 Q. Just an approximate.

11 MS. REID-MOORE: Form. Go ahead.

12 THE WITNESS: I don't know. It's hard
13 to say because, you know, there were -- there were, you
14 know, a handful of everything. I wouldn't even want to
15 speculate because that would be just an unfair
16 statement because I truly don't recall.

17 Q. BY MR. DILLINGHAM: Okay. But you do
18 know there were some of the demo reports that you
19 looked at that had the injury box circled "yes"?

20 A. Yes.

21 Q. When you look at the one we were talking
22 about earlier, 3RFP2-00001, you see in the percent
23 injuries from Taser 0.00 percent in that line item,
24 right?

25 A. Yes.

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1 Q. That certainly wasn't your knowledge
2 based upon your review of the demo reports you saw,
3 correct?

4 MS. REID-MOORE: Form.

5 THE WITNESS: That would be correct.

6 MR. DILLINGHAM: That's all I have.

7 Thank you very much.

8 FURTHER EXAMINATION

9 BY MS. REID-MOORE:

10 Q. I do have a follow-up -- it's not a
11 follow-up. It's actually separate, but with respect to
12 the -- I may need you to pull out the CD because it
13 wasn't an exhibit, the one that has all of the RFP's
14 listed with each -- the VD reports.

15 MR. WILMER: The white one.

16 MS. REID-MOORE: Yeah, the white one.

17 Q. BY MS. REID-MOORE: Okay. Earlier you
18 were shown a CD, it's not marked as an exhibit, but on
19 it is says Taser field reports, and on there it says no
20 dates and then it shows the years 2000 through 2004.
21 Do you recall being shown that earlier today in your
22 deposition?

23 A. Yes.

24 Q. Okay. Now, with respect to this CD, and
25 all the information that is contained on it, I believe

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1 you testified that you provided Renaud Cook with CD's?

2 A. Yes.

3 Q. Did you provide Renaud Cook with more
4 than one CD with this information on it regarding
5 field -- actually Taser demo reports?

6 A. Yes.

7 Q. Okay. Well, the reason being, this CD
8 right here, the single one, is this one you created?

9 A. No.

10 Q. Okay.

11 A. I did not create that one.

12 FURTHER EXAMINATION

13 BY MR. DILLINGHAM:

14 Q. Okay. So that we're clear, the white CD,
15 and hold it up again for the camera, the white CD that
16 says Field -- Taser Field Reports, no dates and then
17 calendar years, you didn't put that information on the
18 label, right?

19 A. No.

20 Q. Somebody else did that?

21 A. Yes.

22 Q. Your CD that you forwarded to Renaud Cook
23 has a different form?

24 A. Yes.

25 Q. And a different label?

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1 A. Yes. So I apologize if I misspoke
2 before. I --

3 Q. No, no, you didn't misspeak at all. We
4 were just -- we just need to get this squared away.

5 A. Okay.

6 MR. DILLINGHAM: Okay. That's all I
7 have.

8 MS. REID-MOORE: Sorry, one more.

9 FURTHER EXAMINATION

10 BY MS. REID-MOORE:

11 Q. The separate CD's that you provided to
12 Renaud Cook which relate to the human volunteer demo
13 reports for 2000 through 2004, do you know when those

14 were provided to Renaud Cook?

15 A. I don't recall when.

16 Q. Okay.

17 A. I don't -- I don't recall.

18 MS. REID-MOORE: That's all I have.

19 MR. DILLINGHAM: That's all I have.

20 Thank you very much. You're done.

21 THE WITNESS: Wow.

22 THE VIDEOGRAPHER: This concludes the
23 deposition of Pam Schreiner. We are off the record at
24 11:08.

25 (WHEREUPON, a discussion was held off the

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1 record.)

2 THE VIDEOGRAPHER: On the record at
3 11:09.

4 MR. DILLINGHAM: You have the right to
5 read and sign this deposition if you want to make sure
6 that everything was transcribed accurately and
7 correctly. You can waive that right, or the court
8 reporter will send you a deposition to read and sign.

9 Now, one of the problems we do have is
10 that we have a trial date of June 28th right now. So
11 if you want to read and sign, we'll try to get it to
12 you as soon as possible, but we would request that if
13 you do do that and you do make any changes, that you
14 get it back to us before June 28th. Okay?

15 THE WITNESS: I understand.

16 MR. DILLINGHAM: All right.

17 THE WITNESS: And that's fine. I -- if
18 I -- if you need it -- whatever I need to do. I don't
19 care.

20 MR. DILLINGHAM: Do you want to read and
21 sign or are you willing to waive it?

22 THE WITNESS: I'm willing to waive it.

23 MR. DILLINGHAM: Okay. Thank you.

24 THE VIDEOGRAPHER: Off the record at
25 11:10.

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1 (WHEREUPON, the deposition was concluded
2 at 11:10 a.m.)
3

4 (Signature waived.)
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1 STATE OF ARIZONA)
2 COUNTY OF MARICOPA) ss.

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BE IT KNOWN that the foregoing deposition was taken by me, SHELLEY HAVERMANN, a Certified Court Reporter, in the State of Arizona; that the witness before testifying was duly sworn to testify to the whole truth; that the questions propounded to the witness and the answers of the witness thereto were taken down by me in shorthand under my direction; that the witness waived reading and signing said deposition; that the foregoing pages are a true and correct transcript of all proceedings had upon the taking of said deposition, all done to the best of my skill and ability.

I FURTHER CERTIFY that I am in no way related to any of the parties hereto, nor am I in any way interested in the outcome hereof.

DATED at Phoenix, Arizona, this 1st day of June, 2005.

Pam Schreiner depo (AZ) Powers 05-25-05

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SHELLEY HAVERMANN
Certification #50432

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